

**FTC Communications, LLC**  
**E911 Indoor Location Accuracy: Initial Implementation Plan and Progress Report**  
**PS Docket 07-114**  
**August 3, 2017**

**I. Introduction**

This document describes the initial implementation plan of FTC Communications, LLC (“Company”) for meeting the Federal Communications Commission’s (“FCC” or “Commission”) requirements for indoor location accuracy (“Accuracy Requirements”), and includes a report on the status and progress of Company toward meeting those Accuracy Requirements.

Company is a non-nationwide CMRS provider and is implementing and reporting on E911 indoor location accuracy requirements consistent with the *Parallel Path for Competitive Carriers’ Improvement of E911 Location Accuracy Standards* as submitted by the Competitive Carriers Association to the FCC. Company’s plan will evolve consistent with improvements and limitations realized by the nationwide CMRS providers, relevant communications vendors, and industry organizations leading the efforts to increase E911 indoor location accuracy.

Company submitted its February 2017 live call data report, as well as its June 2017 certification of compliance with the April 2017 horizontal location requirements. Company has also recently submitted the next semi-annual live call data report for August 2017.

**II. Horizontal Location Accuracy**

Company has implemented existing location technologies consistent with deployment and testing in the 911 location accuracy test bed. Company assessed the accuracy of those technologies in accordance with relevant ATIS industry standards. Company continues to monitor the efforts of the nationwide CMRS providers, 911 service providers, and other industry leaders with regard to the development and improvement of location technologies. Company anticipates deploying new and/or improved location technologies appropriate for the morphologies Company serves, focusing on network tools, improved handsets, and other products and services, to improve its ability to deliver dispatchable locations or x/y geographic coordinates within 50-meter accuracy. Company expects that its ability to meet increasing location accuracy requirements will improve inherently based on the continued location accuracy implementation efforts of the nationwide CMRS providers. Company contemplates following the implementation efforts of the nationwide CMRS providers where relevant and appropriate for Company’s network and morphology(ies) served.

**III. Vertical Location Accuracy**

Company will monitor the efforts of the nationwide CMRS providers, 911 service providers, and other industry leaders with regard to developments for delivering a 911 caller’s vertical location where appropriate, specifically implementation and availability of the National Emergency Access Database (“NEAD”), as well as development and testing of Z-axis solutions. Company contemplates adopting solutions that will meet vertical location requirements where appropriate based on the direction taken by nationwide CMRS providers. Company expects to

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follow the efforts of the nationwide CMRS providers for complying with the requirement to provide uncompensated barometric data to Public Safety Answering Points where subscriber handsets have the capability to deliver that information.